



Case 1:24-cr-00121-LAK Document 34 Filed 04/22/25 Page 1 of 1
U.S. Department of Justice

*United States Attorney
Southern District of New York*

26 Federal Plaza, 37th Floor
New York, New York 10278

April 22, 2025

MEMO ENDORSED

BY ECF

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Brandenstein, 24 Cr. 121 (LAK)*

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: <u>4/22/25</u>
DATE FILED: <u>4/22/25</u>

Dear Judge Kaplan:

The Government respectfully writes on behalf of the parties to request an adjournment of the upcoming conference in this matter, which is scheduled for Wednesday, April 23, 2025. The Government is currently in the process of finalizing a plea agreement for the defendant and expects to provide such an agreement to the defense by the end of the week. The defense will then require additional time to review the agreement with their client and may seek to translate the agreement into German, their client's native language. Accordingly, the Government respectfully requests that the Court adjourn the upcoming conference for a period of thirty-days to permit the parties to finalize a plea agreement and for the defendant to review the agreement with counsel.

In addition, the Government requests, with the consent of the defendant, by and through defense counsel, that the Court exclude time through the date of the next conference under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), to permit the Government to finalize a plea agreement, for the defendant to review the agreement with counsel, and for the parties to confer regarding a pre-trial disposition.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney

By: /s
Mitzi Steiner
Assistant United States Attorney
(212) 637-2284

Cc: All Counsel of Record (by ECF)

SO ORDERED

LEWIS A. KAPLAN, USDS

*Conference adjourned
and time excluded
through 5/22/25 4pm
at 4pm. Interim
8 Justice served
Tuesday or after
in court indef. +
public in speedy
trial by business
reasons*

4/28/25